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August 1, 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

By Electronic Submission

John Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

David Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re E911 Interim Report for Tier III Carriers
CC Docket No. 94-102
American Samoa License, Inc.

Dear Ms. Dortch

Pursuant to the Commission's *Order to Stay*, in the above referenced docket,¹ American Samoa License, Inc. ("ASLI") hereby submits its E911 Interim Report for Tier III carriers. This Report provides the Commission with the current status of LCC's E911 efforts and its progress towards compliance with the Commission's E911 Phase II benchmarks

¹ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, *Order to Stay*, FCC 02-210, 17 FCC Rcd 14,841 (2002)

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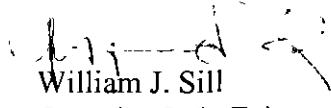
The attached report is timely being submitted to the appropriate e-mail address provided in the Commission's Public Notice.² The original report is being mailed to the Office of the Secretary from American Samoa. Due to the delays with mail service from the island, the attached copy of the report is being submitted so as to ensure its timely submission to the Commission.

Please contact the undersigned counsel for ASLI if you should have any questions regarding this Report.

Sincerely,

Wilkinson Barker Knauer, LLP

By


William J. Sill

Georgina L.O. Feigen

² See Public Notice, Wireless Telecommunications Bureau Provides Further Guidance On Interim Report Filings by Small Sized Carriers, DA 03-2113, rel June 30, 2003



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July 31, 2003

Federal Communications Commission, 911compliance@fcc.gov,
Secretary, Federal Communications Commission,
445 12th Street, S.W., Washington, D.C. 20554

Subject: Interim Report, Phase I and Phase II E911 preparations
American Samoa License, Inc. (FCC FRN #0001-8434-32)
ASLI does business as Blue Sky Communications

Dear Commission,

American Samoa License Inc (ASLI) is a Tier III PCS carrier doing business in American Samoa under the name, Blue Sky Communications. We hereby file our Interim Report in order to assist the Commission in its monitoring of Tier III carriers' Phase I and Phase II E911 deployment progress.

We attach an affidavit from the ASLI vice president attesting to the truth and accuracy of this report. (The physical affidavit was mailed to the address above on July 30, 2003, but a filing was also made via email to the email address above).

ASLI has not received any request for E911 services from American Samoa's only PSAP, the American Samoa Government's Department of Public Safety. On the contrary, the sole PSAP in our market has only a basic 911 service and is incapable of receiving and utilizing the data elements associated with either Phase I or Phase II of E911 service.

Our wireless customers are all enabled to dial "911" on their handsets (even without a SIM card in their phone) and their calls are routed to the territory's sole Police Dispatcher, where they get rudimentary 911 services, just as every call to the PSAP is, regardless of whether it originates from a wireless phone or a wireline phone. This was true in 2000 when we first wrote the FCC on this matter, and it was true in 2001 when we last wrote the FCC on this matter, and it remains true today.

Unlike most areas on the U.S. Mainland, there are no street addresses in American Samoa. As a result, the processing of a 911 call is more complex. For example, if the police dispatcher receives a "911" phone call from someone in need of an ambulance due to a medical emergency, the dispatcher (who often lacks specialized 911 training) will gather basic information such as the caller's telephone number, disconnect from the "911" caller, then dial a separate seven-digit number to reach the Emergency Medical Service at the territory's only hospital, or utilize UHF radio. (It is also worth noting that that EMS uses ASLI's wireless service as their primary means of communication, as they believe it has better coverage than the Public Safety UHF system.) The EMS will then call the original caller and obtain geographic directions for the ambulance.

Recent conversations with the Commissioner of Public Safety, High Chief Tuteleapaga Peseta Fua Ioane, lead us to believe that the PSAP will not be E911-ready in any identifiable timeframe.

ASLI is presently ready to be E911 Phase I compliant in all particulars (through a dynamic, real-time TCP/IP linkage), but we have not been called upon to do our part in an E911 Phase I effort.

As for Phase II, we intend to deploy a network-based solution when given 6-months notice by the PSAP providing us with a valid request. While we have investigated handset based solutions, we remain concerned over the availability and price of ALI capable handsets for a market as small as ours. At present, we are upgrading our Nortel Base Station System to software release version 12.4 (forecast completion date is September 30, 2003) and we are in final negotiations to procure a latest version Mobile Switching Center (forecast completion is January 30, 2004).

With those building blocks in place, we will be able to finalize a deal with an E911 Phase II vendor to interface with our MSC and BSS. Vendors recommended by our likely MSC provider include True Position, Geometrix911, Telecomsys, and Snaptrack.

Realistically, by the time the local PSAP gives us the necessary 6-month notice for Phase II service, the economics of E911 Phase II compliance may have shifted so that an ALI-capable handset solution would be more cost effective. The further out in time Phase II implementation occurs, the more likely it becomes that we may be in a position to become compliant through the use of more widely available and significantly less expensive ALI-capable handsets. Thus, we would like to reserve the ability to adopt that technology should it prove a better "fit" for American Samoa when the time comes.

We anticipate meeting the ultimate implementation date of December 31, 2005, or any earlier date that falls within 6 months of receiving notice of an upcoming valid PSAP request for E911 Phase II service. As previously stated, ASLI further pledges to meet any E911 Phase I requests that the PSAP should request within the allotted six month time period from receipt of such a request.

Notwithstanding our commitment to meeting E911 according to the timetables set out in the FCC orders, we would like to once again remind the FCC that American Samoa presents a very different environment than the fifty states. Notably, per capita income is one-fifth that of the United States (\$4,259 vs \$21,587), and American Samoa's infrastructure development reflects that low level of economic activity. For example, we cannot yet boast of, or curse at, a stop light in American Samoa. Moreover, as discussed above, the lack of a street address system inhibits the kind of geographic sophistication that is the basis for effective 911 service, let alone postal delivery.

Should you have any questions, I stand ready to respond. This interim report is being sent via email and placed in the Postal System, along with an original declaration from me as to its complete and accurate nature.

Sincerely,

Lewis Wolman, Vice President
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